

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

CYNTHIA K. HAYNES (a/k/a Cynthia K. Randolph),)
individually and under the Missouri Wrongful Death)
Statute,)

Plaintiff,)

v.)

Cause No. 1:21-CV-00160-SNL

JENNIFER WILLIAMS, individually,)
JENNIFER WILLIAMS, d/b/a WILLIAMS LAW,)
SPAIN, MILLER, GALLOWAY & LEE, LLC,)
a Missouri limited liability company,)
BERNICE HAYNES, individually and)
CHARLES HAYNES, individually,)

Defendants.)

JURY TRIAL DEMANDED

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME AND POSSIBLE
MODIFICATION OF LENGTH OF MEMORANDUM**

COMES NOW Plaintiff by and through counsel and moves that this Court allow her an extension of time by when to reply to Defendants' Motions for Dismiss and possibly to modify the length of her responsive memorandum for the following reasons:

1. Three Defendants have filed Motions to Dismiss to which Plaintiff intends to file responses.

2. Under local rule 4.01(D) Plaintiff has fourteen (14) days from the date the Motions were filed in which to respond to the Motions. Given the different issues raised by the different Motions, Plaintiff's counsel believes that it will require more than fourteen (14) days to respond. Plaintiff's counsel believes that they can respond within thirty (30) days from the date the Motions were filed or until February 17, 2022.

3. Defense counsel who filed the Motions have consented to the additional time for Plaintiff to respond to their Motions to Dismiss.

4. Under the local rules, Plaintiff's counsel must limit his Memorandum in response to each Motion to fifteen (15) pages. However, the Motions to Dismiss filed by Jennifer Williams and Spain-Miller have overlapping issues. Plaintiff's counsel believes that it might be appropriate and expeditious to combine Plaintiff's responses to those two Motions into one response. However, Plaintiff believes that it would take more than fifteen (15) pages for a Memorandum to respond to these Motions.

5. Plaintiff's counsel believes that if they choose to file one Memorandum in response to both of those Motions the resultant Memorandum will be twenty-five (25) pages or less which would be less than the total of response memoranda if they utilize the fifteen (15) pages per response.

WHEREFORE Plaintiff prays that this Honorable Court grant her an extension by when to file responses to Defendants' Motions to Dismiss until February 17, 2022 and grant her the option of filing one Memorandum Response to the Motions to Dismiss filed by Defendants Williams and Spain-Miller limited to twenty-five (25) pages should they so choose to do one combined response Memorandum and grant such other and further relief as this Court deems just under the circumstances herein.

Respectfully submitted,

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

It is hereby certified that on this 20th day of January 2022, a copy of the foregoing was filed electronically with the Clerk of the Court to be served to all counsel by operation of the Court's electronic filing system.

/s/ Laurence D. Mass